

1 Jeremy J. Thompson, Esq. (12503)
2 **CLARK HILL PLC**
3 3800 Howard Hughes Parkway, Suite 500
4 Las Vegas, Nevada 89169
5 Tel. 702.697.7527
6 Fax 702.862.8400
7 jthompson@clarkhill.com
8 *Attorneys for Plaintiff Strike 3 Holdings, LLC*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STRIKE 3 HOLDINGS, LLC,
Plaintiff,

vs.

JOHN DOE subscriber assigned IP address
98.167.68.73,

Defendant.

Case Number: 2:19-cv-01075-RFB-NJK

**DECLARATION OF SUSAN B. STALZER
IN SUPPORT OF PLAINTIFF'S EX
PARTE MOTION FOR LEAVE TO
SERVE A THIRD PARTY SUBPOENA
PRIOR TO A RULE 26(f) CONFERENCE**

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**DECLARATION OF SUSAN B. STALZER IN SUPPORT OF PLAINTIFF'S
MOTION FOR LEAVE TO SERVE A THIRD PARTY SUBPOENA PRIOR TO A
RULE 26(f) CONFERENCE**

I, Susan B. Stalzer, do hereby state and declare as follows:

1. My name is Susan B. Stalzer. I am over the age of 18 and am otherwise competent to make this declaration.

2. This declaration is based on my personal knowledge and, if called upon to do so, I will testify that the facts stated herein are true and accurate.

3. I work for Strike 3 Holdings, LLC ("Strike 3") and review the content of their motion pictures.

4. I hold a Bachelor's degree and Master's degree in English from Oakland University.

5. I have a long history of working in the fine arts, with an emphasis on writing, including having served as an adjunct professor of composition and literature.

6. I am familiar with Strike 3's plight with online piracy and its determination to protect its copyrights.

7. I was tasked by Strike 3 with verifying that each infringing file identified as a motion picture owned by Strike 3 on torrent websites was in fact, either identical, strikingly similar or substantially similar to a motion picture in which Strike 3 owns a copyright.

8. IPP provided me with the infringing motion picture file for each of the file hashes listed on Exhibit A to Strike 3's Complaint.

9. I viewed each of the unauthorized motion pictures corresponding to the file hashes side by side with Strike 3's motion pictures, as published on the *Blacked*, *Blacked Raw*, *Tushy*, *Tushy Raw*, and/or *Vixen* websites and enumerated on Exhibit A by their United States Copyright Office identification numbers.

10. Each digital media file, as identified by the file hash value, is a copy of Strike 3's corresponding motion picture and is identical, strikingly similar or substantially similar to the

1 original work identified by their United States Copyright Office identification numbers on
2 Exhibit A to the Complaint.

3 II. Additionally, I used American Registry for Internet Numbers ("ARIN") to
4 confirm that the ISP did own Defendant's IP address at the time of the infringements, and hence
5 has the relevant information to identify Doe Defendant.

6 **DECLARATION**

7 PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the
8 laws of the United States of America that the foregoing is true and correct.

9 Executed on this 17th day of July, 2019.

10 SUSAN B. STALZER

11 By: 